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Attorneys for Stillwell Madison, LLC

UNITED STATES BANKRUPTCY COURT
CENTRAL DISTRICT OF CALIFORNIA – LOS ANGELES DIVISION

In re:

GIRARDI KEESE,

Involuntary Debtor.

Case No. 2:20-bk-21022-SK

Chapter 7

**NOTICE OF APPEARANCE AND
REQUEST FOR SPECIAL NOTICE**

Date:
Time: [No Hearing Required]
Place:

PLEASE TAKE NOTICE that Stillwell Madison, LLC (“Stillwell Madison”), by and through its undersigned counsel hereby enters a notice of appearance pursuant to Rule 2002(i) of the Federal Rules of Bankruptcy Procedure (the “Bankruptcy Rules”) and section 1109(b) of title 11 of the United States Code (the “Bankruptcy Code”) and requests that copies of all notices and pleadings given or required to be given, and all papers served or required to be served, be given and served upon the following persons at the addresses, telephone numbers, facsimile numbers and email addresses indicated:

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PLEASE TAKE FURTHER NOTICE that, pursuant to Bankruptcy Code section 1109(b), the foregoing demand includes not only the notices and papers referred to in the Bankruptcy Rules specified above, but also includes, without limitation, all orders and notices of any applications, petitions, motions, complaints, requests or demands, hearings, answering or reply papers, memoranda and briefs in support of any of the foregoing and any other document filed with, or otherwise brought before, this Court with respect to the above-referenced bankruptcy proceeding, whether formal or informal, whether written or oral, and whether transmitted or conveyed by U.S. mail, electronic mail, courier service, hand delivery, telephone, facsimile transmission, telegraph, or otherwise.

PLEASE TAKE FURTHER NOTICE that, Stillwell Madison intends that neither this Notice of Appearance and Request for Special Notice nor any later appearance, pleading, claim or suit shall waive: (i) Stillwell Madison's right to have final orders in non-core matters entered only after *de novo* review by a District Court Judge; (ii) Stillwell Madison's right to trial by jury in any proceeding so triable in any case, controversy, or proceeding related to this bankruptcy proceeding; (iii) Stillwell Madison's right to have the District Court withdraw the reference in any matter subject to mandatory or discretionary withdrawal; or (iv) any other rights, claims, actions, defenses, setoffs, or recoupments to which Stillwell Madison is or may be entitled under agreements, in law or in equity, including the right to contest the jurisdiction of the United States Bankruptcy Court for the Central District of California over Stillwell Madison, all of which rights, claims, actions, defenses, setoffs, and recoupments Stillwell Madison expressly reserves.

Dated: December 22, 2020

DLA PIPER LLP (US)

/s/ Eric D. Goldberg
Eric D. Goldberg
Attorneys for Stillwell Madison, LLC